# The State of Minnesota Draft Action Plan for Housing and Community Development FY2009



#### 91.320 Action Plan

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#### 91.320 Action Plan

This section is written pursuant to the requirements of Section 91.320 of the Consolidated Plan regulations and is organized by paragraph citation.

#### §91.320(b) Executive Summary

Throughout the Consolidated Plan process, the state was mindful of its housing and community development challenges that were identified in public comment and regional public forums and through secondary statistical research. Despite widespread distribution of invitations to comment on housing and community needs, very few written comments were submitted and there were no attendees at the public meetings. The state believes that the housing and community needs are the same as when the 2007-2011 Consolidated Plan was developed; consequently, federal resources will be used to address public facilities projects, commercial rehabilitation, emergency shelters, homeless prevention, affordable housing development, homeownership, and residential rehabilitation in 2009.

#### **Evaluation of Past Performance**

Homebuyer Downpayment and Closing Cost Assistance (HOME HELP)

For 2008, Minnesota Housing allocated its ADDI funds of \$58,826 and \$3,333,174 of HOME funds for a downpayment assistance program called HOME HELP, or the HOME Home Entry Loan Program. Only 52 households were served in 2008 compared to the goal of 1,090 because the HOME HELP entry cost assistance program was not implemented until July of 2008 and the program became more tightly targeted than originally planned to encourage ownership among households of color and to stabilize foreclosure-impacted neighborhoods. More importantly, the anticipated assistance of 1,090 low-income first time homebuyers was based on a proposed \$5,000 per household maximum and an estimated rather than actual fund allocation. In fact, maximum assistance in the current HOME HELP Program is \$14,999 per loan and most borrowers have received the maximum amount allowed.

#### Minnesota Urban and Rural Homestead Program (MURL)

After HUD required that Minnesota Housing no longer use contracts for deed as the purchase instrument, the program was changed to require buyers to obtain mortgage financing in the market and the grantee to convey title at the time of purchase. Eighteen projects have been purchased and rehabilitated but are unsold to homebuyers due to the collapse of the real estate market, and tightened mortgage underwriting standards that HOME-eligible low-income buyers are having difficulty meeting. Five of the eighteen projects have been sold and Minnesota Housing awaits final closing documents.

#### **HOME Rental Rehabilitation**

Minnesota Housing estimated it would provide rehabilitation assistance to 450 low-income rental units, 406 such units were completed.

#### **HOPWA**

Having served 139 households in 2008, Minnesota Housing exceeded its projection of serving 110.

#### Community Development Block Grant Funding(CDBG)

The following needs identified Housing and Community Development within the State of MN Consolidated Plan 2007-2011 continue to be a priority for funding from CDBG with some minor revisions.

The majority of CDBG funds will continue to focus attention on housing rehabilitation and preservation, economic needs of communities and public infrastructure needs. Due to the current downturn of new construction needs, there does not appear to be as much of a demand for the creation of new, affordable housing, but that trend can change quickly, so we will continue to keep a watchful eye on the need for new affordable housing.

#### Summary of Planned Actions

Based on the information received and the needs documented, the state will focus their attention on the continued needs of communities statewide by:

- Focusing on the findings from the citizen participation efforts (public forums, regional housing advisory committees and continuum of care meetings, and public comments).
- Allocating program dollars to their best use, with the recognition that nonprofits and communities vary in their capacities and that some organizations will require more assistance and resources.
- Recognizing that the private market is a viable resource to assist the state in achieving its housing and community development goals.
- Emphasizing flexibility in funding allocations.
- Maintaining local decision-making and allowing communities to tailor SCDP programs to best fit their needs.
- · Leveraging and recycling resources, wherever possible.
- Understanding the broader context within which housing and community development actions are taken, particularly in deciding where to make housing and community development investments.

The above summary is based on the fact that the state continues to have an unmet demand for safe and decent affordable housing units to serve extremely low and very low income households.

That the top regional needs identified in the public forums continue to included affordable housing, housing rehabilitation and preservation, and public infrastructure improvements.

That the housing and service needs of special populations are significant, and resources to address these needs are lacking.

#### Summary of Objectives and Outcomes

SCDP Activities	Objective	Outcome	
Owner Occupied Rehab	2	1	
Rental Rehabilitation	2 .	1	-
Commercial Rehabilitation	3	3	Objective
Public Facilities Projects	1	3	1 Create suitable living environments
New Construction	2	2	2 Provide decent affordable housing

Homeownership Assistance	2	2	3 Create economic opportunities
Relocation	2	1	8 9
Acquisition	1	1	Outcome
Clearance	1	1	1 Availability/accessibility
HOME Activities			2 Affordability
Rental Rehabilitation	2	2	3 Sustainability
Downpayment Assistance (ADDI)	2	2	*
HOPWA Activities			, ,
Emergency rent, mortgage, utility assistance	2	2	
ESG Activities			
Emergency Shelters	1	1	1 .
Homeless Prevention	2	2	1

#### **Evaluation of Past Performance**

American Dream	Downpayment Initiative (AD)	DI)		
2007	56 households	\$555,000		
2008	54 households	\$794,948		
HOME Rental Re	habilitation			
2007	441 Units	\$5,970,087		
2008	406 Units	\$ 5,684,000		
Minnesota Urban	and Rural Homestead progra	m (MURL)		
2007 6 units		\$608,656		
£	×	τ.		
Small Cities Devel	opment Program			
2007		2		
Owner Occupied	257 Households	8,459,066		
Rental Rehab	15 Households	950,030		

43 Buildings	2,028,552		
2	e 9		
s for Persons with AIDS	2 <sub>5</sub>		
125 Households	111,255		
139 Households	110,033		
rants Program			
24,970 individuals	1,198,193		
26,441 individuals	1,232,379		
	125 Households 139 Households rants Program 24,970 individuals		

#### The Citizen Participation and Consultation Process

The state reached out to citizens, advocacy organizations, nonprofits, local governments, business, and the affordable housing industry in general through a notice published in the statewide edition of the September 28, 2008, Minneapolis Star Tribune and the September 29, 2008, State Register soliciting their participation in public hearings and written comments.

The MN Department of Employment and Economic Development invited the public to attend one of nine informational sessions provided throughout the state to educate the public about programs available and any modifications that were made. The public was encouraged to provide comment. 300 representatives from local governments, non-profits, businesses and state and local government participated.

A public hearing was held on Wednesday, October 15, 2008 and a second public hearing was held on December 5, 2008 at the MN Department of Employment and Economic Development Office, 332 MN St. Suite E200, St. Paul MN 55101, James J Hill Room.

Summary of Public Notices see Appendix C. Summary of Comments or Views and Responses see Appendix E.

#### §91.320(c)(1) Federal Resources

Table 34

Agency	Allocation
DEED	\$20,000,000 (est.)
DEED Program Income	\$ 100,000
MHFA (HOME)	\$ 9,800,000 (est.)
MHFA (HOME) Program income	\$ 70,000
MHFA (ADDI)	\$ 50,000
MHFA (Neighborhood Initiative Grant)	\$ 198,000
MHFA (HOPWA)	\$ 118,000
DHS (ESGP)	\$ 1,232,379
Total	\$31,827,000

#### §91.320(c)(2) Other Resources

The state provides substantial appropriations for affordable housing. Table 35 below identifies the state appropriations for the 2008-2009 biennium.

Table 35

State Appropriations for Housing Programs, FY2	
Programs	Appropriations
Economic Development and Housing Challenge Program	\$34,244,000
Housing Trust Fund	\$22,110,000
Bridges	\$ 5,276,000
Family Homeless Prevention	\$ 14,930,000
Affordable Rental Investment Fund	\$20,492,000
Rehabilitation Loans	\$ 9,874,000
Homeownership Education, Counseling, and Training	\$ 1,730,000
Capacity Building Grants	\$ 680,000
Homeownership Assistance Fund	\$ 1,770,000
Tribal Indian Housing	\$ 3,077,000
Urban Indian Housing	\$ 374,000
Source: Minnesota Housing Finance Agency	

Minnesota Housing develops a two-year "Affordable Housing Plan" that describes all its resources for the period and how they are allocated among the agency's activities. Resources include not only state and federal appropriations, but also low-income housing tax credits, tax-exempt and taxable bond proceeds, and agency-internally generated resources. For the two-year period from October 1, 2007 to September 30, 2009, Minnesota Housing has identified and allocated \$1.62 billion of new resources to address the affordable housing needs identified in this plan.

#### **HOME Funds**

Home Leveraging Funds. The HOME Rental Rehabilitation program requires owners of the rental units who are borrowing less than \$100,000 to provide at least 25 percent of the total development cost. HOME downpayment assistance provides up to \$14,999 of downpayment assistance that permits the homebuyer to obtain a mortgage for the balance of the purchase price.

*HOME Match Funds.* Minnesota Housing matches HOME dollars with state-funded tenant-based rental assistance through its Housing Trust Fund and Bridges programs.

#### Local Resources

In addition to the federal housing resources covered by this Consolidated Plan (i.e., CDBG, HOME, ESGP, and HOPWA), Minnesota benefits from a wide variety of state, local, private, and non-profit resources.

The CDBG Program leverages the following types of resources: Minnesota Housing, Bank Loans, Federal Home Loans, Rural Development, PFA, private funds, etc.

Local governments can form housing and redevelopment authorities (HRAs), economic development authorities (EDAs), or engage in tax increment financing (TIF). The resources associated with each are detailed below.

HRA. In Minnesota, a city, county, or group of counties may establish an HRA. An HRA's primary area of operation is housing program development and administration. There are four basic areas in which HRAs are active: public housing, rental assistance, single and multifamily housing rehabilitation, and housing development. HRAs may levy a tax and exercise bonding authority to finance housing activities. An HRA may issue general obligation revenue bonds for qualified housing development projects and may pledge the general obligation of the general jurisdiction governmental unit as additional security for the bonds. The qualified housing development project must provide housing either for the elderly or for individuals or families with incomes not greater than 80 percent of the area median family income.

**EDA.** A city may establish an EDA to assist with and promote housing and economic development within its jurisdiction. An EDA may also act as the city's HRA. EDAs are authorized to levy a tax and issue bonds for housing and economic development.

TIF. A local jurisdiction may use revenue derived from a TIF housing district to finance the cost of housing projects intended for occupancy by persons or families of low- and moderate-income.

Private resources. Besides the number of for-profit developers involved in affordable housing—some of whom have participated in valuable partnerships with nonprofit developers—the primary resource invested by for-profit entities for new rental housing is investment in housing tax credit syndications. Many Minnesota corporations invest in the Local Initiatives Support Corporation's National Equity Fund. In addition, several Minnesota utility companies are investing in tax credit projects throughout the state.

Nonprofit resources. Foundation and private funding play a critical role in the provision of affordable housing in countless communities throughout the state. Although it would be impossible to identify all the different sources, the following are some of the major foundation or private efforts. This list does not include the many private nonprofit development organizations, churches and synagogues, and foundations that play a key role in providing affordable housing.

• Habitat for Humanity (Habitat). Relying on volunteer labor and donated materials, Habitat provides homeownership opportunities for very low-income families. Home-buying families participate in constructing their own homes as well as volunteer on someone else's. Habitat support is located in: Bemidji, Brainerd Lakes, Dakota County, Duluth, Fergus Falls, Freeborn/Mower, Lake Aggasiz, Minneapolis North, Minneapolis Southside, Northeast Suburban (Twin Cities), Rice County, Red Wing, Rochester Area, south central Minnesota (Mankato), St. Cloud Area, St. Paul, and Willmar.

- Minnesota Housing Partnership (MHP). As part of its Network Project, the MHP has created six regional networks outside the Twin Cities Metropolitan Area. The networks work to improve communication among housing developers, social service providers, local officials, and the public by acting as an information clearinghouse for their regions. They undertake public education activities and coordinate regional CoC planning efforts in the six regions of Greater Minnesota.
- Family Housing Fund. Funded originally by the McKnight Foundation, the Family Housing Fund provides financing for a variety of affordable housing projects and provides leadership on many affordable housing issues.
- Greater Minnesota Housing Fund. The McKnight and Blandin foundations provided \$25 million in 1996 to support the creation of affordable housing in economic growth centers outside of the seven-county Twin Cities area. This pool of financial resources has been used in several ways, including equity investment or subordinated debt in specific projects; loan guarantees or revolving loan funds for construction financing, site development, or acquisition of senior-occupied single-family homes and their subsequent sale to younger families; and guarantees or other incentives to create a down-payment assistance fund and owner-occupied housing rehabilitation.
- Local Initiatives Support Corporation (LISC). LISC is supported by corporate funding from its parent organization to provide equity funding for low-income housing tax credit projects, provide financing for a single family production program in St. Paul, and provide technical assistance and operating support to nonprofit housing developers in St. Paul, Duluth, and Minneapolis.
- Minnesota Coalition for the Homeless. The Coalition addresses a variety of homeless
  issues through a statewide coalition of government officials, service providers, and persons
  experiencing homelessness.
- Neighborhood Housing Services (NHS). NHS programs are located in Duluth,
   Minneapolis, and St. Paul. The Twin Cities NHS is the umbrella organization in the
   Minneapolis-St. Paul area. The NHS's are neighborhood lending organizations that are
   supported by donations from area businesses and other organizations, such as public
   education, school curriculum, and technical assistance.

#### §91.320(d) Activities

#### **HOME Program Activities**

MHFA's HOME programs do not provide funds to local governments and nonprofits to carry out activities. Rather, the state's HOME programs provide funds directly to the recipient but through contractors employed by the state to assist in delivering the program, as in the case of HOME downpayment assistance and the HOME Rental Rehabilitation programs.

If the HOME allocation is more or less than \$9,800,000, MHFA anticipates that it will either increase or decrease funding for programs proportionally; however, MHFA's Board is empowered to make allocations of funds. It is MHFA's Board that would reallocate HOME funds between programs described in the action plan; allocate additional funds that might become available either through a greater grant amount or the receipt of program income; or unallocate funds in response to a lesser-than-anticipated grant amount.

HOME Rental Rehabilitation Program will be provided approximately \$5.34 million of FFY 2009 funds; and HOME downpayment assistance will be provided \$3.5 million.

HOME Rental Rehabilitation Program. The HOME Rental Rehabilitation Program provides zero interest rate deferred loans to finance the rehabilitation or acquisition and rehabilitation of privately owned rental property to support affordable, decent, safe, and energy-efficient housing for lower income persons and families. Private individuals, corporations, partnerships, and nonprofit organizations are eligible program applicants. Loans under \$100,000 are forgiven after 5 years and owners are required to match program assistance on a one-to-three basis. Loans of \$100,000 or more are deferred until the earlier of maturity or payment in full of the first mortgage, or default on the loan terms, and no match is required of the owner. Loans are generally limited to less than \$15,000 per unit. But, when necessary to preserve federally-assisted housing, per unit assistance may increase up to \$40,000 per unit.

Local governments and nonprofit organizations act as contractors to MHFA in marketing, administration, and processing of applications. MHFA provides assistance directly to property owners. Owners must meet all HOME and MHFA eligibility criteria, and the project must be financially feasible. Local administrators may employ MHFA-approved selection criteria; e.g., first-come-first-served, a priority for properties located in a specific area of the administrator's jurisdiction, etc.

The amount allocated to this program in 2009 will be approximately \$5.34 million. Minnesota Housing anticipates seeking legislative authority and appropriations to fund a Rental Rehabilitation Program with State appropriations beginning in July 2009. The legislative response will be known by April 2009. If authorizing legislation and sufficient appropriations are provided to offer a program of sufficient scope, some or all of these HOME funds may be reallocated to the single family homeowner Rehabilitation Loan Program.

**Rehabilitation Loan Program.** The Rehabilitation Loan Program provides deferred repayment loans with zero percent interest to assist low-income homeowners in financing basic home improvements that directly affect the safety, habitability, energy efficiency or accessibility of their homes. Eligible applicants must occupy the home as their principal residence, have assets not in excess of \$25,000, and meet the HOME income limits. Homeowners will be required to occupy their home for the full term of the loan, which shall not be less than the required affordability period

required by the HOME program. At successful completion of the loan requirements, their deferred loan will be forgiven.

The maximum loan amount is anticipated to be \$15,000, unless additional funds are necessary to correct lead hazards or make the home accessible for a disabled household member, in which case the loan may be increased up to \$20,000. Final eligibility criteria and loan terms will depend on legislative and Minnesota Housing Board approvals.

HOME Downpayment Assistance. The HOME Downpayment Assistance Program will provide assistance for downpayment and closing costs, including eligible soft costs, to low-income first-time homebuyers. Assistance will be in the form of a zero percent interest rate deferred loan. If the property is sold or ceases to be the principal residence of the homebuyer within five years, the full amount of the loan must be repaid. After the fifth year, 30% of the original loan amount remains owing and must be repaid when the property is sold or ceases to be the homebuyer's principal residence or the loan matures.

Rationale for Allocations. HOME Rental Rehabilitation and downpayment assistance programs are for the benefit of low- and extremely low-income renter households. The needs analysis demonstrates that those households are the most likely to be cost burdened, to be more severely cost-burdened, and to have other housing problems. Therefore, MHFA will allocate all its HOME funds to activities that provide affordable housing primarily to low- and extremely low-income renter households – either affordable rental housing, or affordable first-time homebuyer housing.

The need for homeowner rehabilitation is also demonstrated by the needs analysis. A shift of HOME funding from rental rehabilitation to homeowner rehabilitation is consistent with the needs analysis and will only occur if the Legislature approves and funds a State rental rehabilitation program.

HOME Tenant-Based Rental Assistance (TBRA). The Minnesota Housing Board may allocate program income or reallocate a portion of HOME funds from one or more activities for use in a TBRA program to address long-term homelessness in areas outside the Minneapolis/St. Paul metropolitan area. Local market conditions for use of TBRA would be such that there would not be a readily available supply of permanent supportive housing for homeless households and where Minnesota Housing is assured that assisted housing would become available to the household within the two-year span of the assistance.

Rent assistance would be made available through nonprofits or local governments that arrange for the availability of supportive services for the tenants. Portability of assistance would be limited to housing within the jurisdiction of the entity through which the rent assistance is provided.

The level of assistance Minnesota Housing would provide would be sufficient to move the homeless household into decent housing, but provide adequate incentives for the household to accept Section 8 rent assistance or public housing when it becomes available.

**HOME Disaster Response.** The Minnesota Housing Board may allocate program income or reallocate a portion of HOME funds from one or more activities for use in a disaster response. The type of response will be determined based on the needs in the disaster area and the other resources that may be available. All recipients of assistance and their housing will be HOME-eligible.

HOPWA Program Activities. HOPWA funds are allocated for use outside the EMSA. In consideration of the fact that almost all persons with HIV/AIDS in Greater Minnesota are housed, the state will fund activities to assist persons to stay in their housing. Those activities are emergency assistance with rent, mortgage, and utility payments. Priority for funding will be given to the Minnesota AIDS Project to continue existing programs.

**ESGP Activities.** ESGP funds will be used to fund homeless prevention activities in the form of emergency mortgage and rental assistance to keep persons in their current housing, and funding for the operating and service costs of shelters. Prevention funding will assist 18,688 individuals in 10,413 households. Funding for the operating and service costs of shelters will benefit 7,753 individuals in 5863 households. The projects do not anticipate receiving any program income during this period.

The target date for completion of these activities is June 30, 2008. Based on the information gathered during the public hearing process on the uses of ESGP funding for the upcoming year, the priority needs were determined to be homelessness prevention and emergency shelter. The only obstacle to addressing these needs adequately will be a shortfall in the funding necessary to address these needs.

SCDP Activities. The SCDP portion of CDBG funds are made available to the state for distribution to develop viable eligible communities by providing financial assistance to address the need for decent, safe, and affordable housing, and economic development and public facility needs; and provide a suitable living environment by expanding economic opportunities, principally benefiting low- to moderate-income households.

Eligible applicants are cities with a population under 50,000 and counties and townships with an unincorporated population of fewer than 200,000.

DEED anticipates the funding level for this program to be approximately \$20,000,000 annually. Funds are made available through a competitive selection process throughout the state.

#### Obstacles to Meeting Underserved Needs

A major obstacle to meeting underserved needs is insufficient funding. The need continues to exceed available resources, especially resources that are the most useful for providing housing for extremely low-income families; i.e., funds that do not require debt service payments.

Increases in the cost of housing outpace income growth, making home ownership more difficult to attain. The virtual collapse of the mortgage market and the availability of private mortgage insurance has made mortgage financing difficult and costly to obtain.

Local market conditions have also affected values. Foreclosures have driven values down substantially in many neighborhoods, making some housing more affordable, but putting others at risk of foreclosure and abandonment, and reducing or eliminating equity against which a property owner could borrow to improve the property.

Cost burden continues to be a substantial obstacle in meeting the need for decent affordable rental housing. The prices for low-income housing tax credits has decreased substantially, requiring additional infusions of capital which, if not deferred loans, increases debt service and reduces affordability.

Federal Regulations such as Davis Bacon present higher costs to a project. This regulation has not bee changed since inception. As a result, fewer rehabilitation of rental and commercial projects due to project dropouts creating an underserved need.

#### §91.320(e) Outcome Measures and 91.320(c)(3) Annual Objectives

The objective for all HOME and HOPWA activities is decent housing, and the outcome category is affordability. Affordability will be provided through affordable HOME financing for the rehabilitation of rental units to minimize the need for amortizing debt and, therefore, increased rents; affordable deferred-loan HOME Downpayment assistance; affordable deferred loan assistance for rehabilitating owner-occupied single family homes; and affordable emergency assistance from the HOPWA program to help low-income persons with HIV/AIDS remain in their housing.

- Homeowner or Rental Rehabilitation: 360 units rehabilitated for low-income tenants; or 295\_rehabilitated units of owner-occupied housing.
- HOME Downpayment Assistance: 543 households will receive downpayment assistance.
- HOPWA: 110 low-income households will receive emergency assistance to remain in their homes.

The objectives of the ESGP funding will be to create suitable living environments for the households that use the shelters receiving these funds, and for those households that received homelessness-prevention assistance to provide decent affordable housing. The outcome measures that will be used to determine success will be to create availability to shelter and to sustain affordability for those households receiving homelessness prevention assistance. The specific indicators that will be used to measure these outcomes will be the number of persons served in shelters receiving this funding and the number of households receiving homeless prevention assistance.

The objective and expected outcomes for the SCDP program activities are as follows:

Activity	Objective	Outcome	Objective
Owner Occupied Rehab	2	. 1	1 Create suitable living environments
Rental Rehab	2	1	2 Provide decent affordable housing
Commercial Rehab	3	3	3 create economic opportunities
Public Facilities Projects	1	3	Outcome
New Construction	2	2	1 Availability /accessibility
Homeownership Assistance	2	2	2 Affordability
Relocation	2	1	3 Sustainability
Acquisition	1	1	
Clearance	1	1	

Any new activities not currently being addressed will be reviewed for outcome measures at the time they are being addressed.

#### §91.320(f) Geographic Distribution

HOME Rental Rehabilitation funds are allocated for use outside other HOME PJ and consortia areas, which generally do not receive direct federal funding. These allocations provide resources where there are none, or a limited amount. The need for new construction in these areas is low, while the need for rehabilitation is high.

If HOME Rental Rehabilitation funds are reallocated to single family owner-occupied rehabilitation, funds will made be available throughout the state, including HOME entitlement and consortia areas so that those areas are not adversely affected by the change in funding source from State appropriations to HOME.

A major objective of Minnesota Housing is to increase the homeownership rate of households of color and to stabilize neighborhoods that have been negatively affected by foreclosures. Given the concentration of households of color and foreclosed properties in the twin cities metropolitan area, HOME downpayment assistance will be available throughout the state.

HOME-funded tenant-based rental assistance would be allocated for use in geographic areas not receiving HOME assistance directly from HUD. Local market conditions in these areas would be such that there are waiting lists for Housing Choice vouchers and public housing, but waiting lists remain open.

Any HOME disaster response that may be necessary will be limited to the area of the disaster.

HOPWA funds are allocated for use outside the EMSA because these are the only funds available in those areas specifically for persons with HIV/AIDS.

ESGP funds will be distributed throughout the state of Minnesota to programs providing shelter and homeless prevention services. The funds will be targeted to areas of the state according to need as measured by the incidence of poverty, housing burden (households paying more than 50 percent of income for housing), and public assistance caseloads. Funds will also be targeted to areas based on the ability of programs providing emergency shelter and homelessness prevention services to demonstrate an ability to deliver appropriate services through the application process for these funds.

SCDP funds are allocated to cities with a population less than 50,000, and counties and townships with an unincorporated population of fewer than 200,000. The flexibility of this program ensures that eligible applicants are able to prioritize and address the needs of their communities.

#### §91.320(g) Affordable Housing Goals, 2009

HOME Rental Rehabilitation: 360 households will be rehabilitated and occupied by

low income households

Rehabilitation Loan Program 295 single-family owner-occupied houses will be

rehabilitated for low-income households

HOME Downpayment Assistance: 543 low-income households will purchase affordable

housing

HOME-TBRA (contingent goal): 20 homeless persons/households obtain affordable rental

housing

HOPWA: 110 households will remain in their houses and avoid

homelessness.

MURL Program: Program canceled, \$3.5 million of 2008 funds have been

allocated to the HOME Downpayment assistance plus

\$2.4 million of unused 2007 funds.

ESG:

SCDP Rental Rehab:

SCDP Owner Occupied Rehab:

SCDP Down payment assistance:

24,970 individuals in 15,081 households.(These numbers are the correct projected numbers).

150 households rehabilitated and maintain fair market

rents

350 low to moderate income families/units

4 low to moderate income households

#### §91.320(h) Homeless and Other Special Needs Activities

#### Addressing the Emergency Shelter and Transitional Housing Needs of Homeless Persons

Funding will be provided from the state of Minnesota to address the shelter and transitional housing needs of homeless persons under the following programs:

Emergency Services Program – The 2008 Minnesota Legislature provided \$950,000 in SFY 2008 for the Emergency Services Program (ESP). This was a one time \$600,000 increase in funding from the base level of \$350,000 per year. Funding for SFY 2009 will revert back to the original base level of \$350,000. ESP funds the operating and service costs of shelters for a variety of populations. It also funds some supportive services-only programs such as drop-in centers and voice mail. It is expected that the program will continue to be funded in SFY 2010/11.

Transitional Housing Program – The 2008 Minnesota Legislature provided \$3,738,000 in SFY 2008 for the Minnesota Transitional Housing Program. This was a one time \$500,000 increase in funding from the base level of \$3,328,000 per year. Funding for SFY 2009 will revert back to the original base level of \$3,238,000. Program funding is provided to 66 transitional housing programs across the state, including programs that serve a variety of populations such as singles, families with children, youth, veterans, battered women, persons with mental illness issues, persons with chemical dependency issues, women escaping prostitution, and others. This funding is used to pay for the services and operating costs of transitional housing programs. It is expected that the program will continue to be funded in SFY 2010/11.

#### Preventing Low-income Singles and Families from Becoming Homeless

Minnesota operates the state-funded Family Homeless Prevention and Assistance Program (FHPAP) to assist those households at imminent risk for homelessness to maintain and retain their housing, and also to assist those households who are already homeless to obtain permanent housing. Currently, FHPAP funding is provided to 74 of Minnesota's 87 counties.

As described elsewhere in this plan, HOPWA prevents homelessness by providing emergency assistance for rent or mortgage payments and utility costs.

#### Assisting Homeless Families to Obtain Permanent Housing

The goal of the Minnesota Transitional Housing Program is to assist participants in obtaining and maintaining permanent housing. The FHPAP also assists homeless participants with the first month's rent and damage deposit to locate and stabilize in permanent housing. The Bridges program provides a rental subsidy for up to five years to persons with mental illness until they can obtain a permanent rental subsidy.

#### Specific Action Steps to End Chronic Homelessness

See Section 91.315 of the 2007-2011 Consolidated Plan for Minnesota's Business Plan to End Long-Term (and Chronic) Homelessness. For a complete description of specific steps the State will take to end long-term and chronic homelessness, see the "Business Plan for Ending Long-Term Homelessness" and "2007 Recalibration of the Business Plan for Ending Long-Term Homelessness in Minnesota," both of which may be found at the Minnesota Housing website www.mnhousing.gov and clicking "Homelessness/Housing Assistance Emerging Markets Local Government" on the red

navigation bar. As in past years, the State will emphasize the provision of permanent supportive housing that may be created through new construction or rehabilitation, including units for households experiencing long-term homelessness in mixed-income developments, providing rental assistance or subsidizing operating costs, and providing housing through the Group Residential Housing program. The State's goal for 2009 is to provide 800 housing opportunities.

#### SCDP Special Needs Activities

SCDP funds may be used for affordable housing development that assists special needs populations. The SCDP is flexible and can assist special-needs populations in a variety of ways, including rehabilitation of homes, shelters, or community centers that serve these populations.

#### §91.320(i) Barriers to Affordable Housing

As explained in Section 91.315(h), the state has acted to reduce the effects of its tax policies by reducing the tax rate on affordable rental units. Minnesota Housing will continue to give preference points in its RFPs to projects for which concessions are given by local government to enhance the affordability of the project.

The state will mitigate the effect of zoning, land use, and impact fee barriers by giving preference points in its selection process to LIHTC projects that rehabilitate existing housing, thereby avoiding these barriers; and to new construction projects that use existing sewer and water lines without substantial extensions.

Preference points are also awarded for LIHTC projects for which development-specific assessments or infrastructure costs are donated or waived or that have been approved for reduced setbacks, reduced parking requirements, decreased road widths, flexibility in site development standards and zoning code requirements, WAC/SAC reductions, and fast-track permitting and approvals.

The state has begun a process to determine how to eliminate or ameliorate the effects of the Jobs-Housing-Transportation (J-H-T) Mismatch described in 91.310(d), "Barriers to Affordable Housing." Between spring 2005 and 2006, the state participated in the National Governors Association policy academy on housing and economic development to develop proposals for addressing the J-H-T mismatch. The participants included the Minnesota Housing commissioner, the assistant commissioner of DEED, the Metropolitan Council regional administrator, and a representative of local government and philanthropy. The participants recommended a competitive communities pilot program for linking working families to housing and transportation. Minnesota Housing will use the Economic Development and Housing Challenge Program to focus linking new housing investments to other quality of life outcomes related to the environment, energy, transportation, and education.

#### §91.320(j) Other Actions

As discussed in the Strategic Plan, the primary obstacles to meeting underserved need are resources and a growing gap between housing costs and incomes. The state will continue to use its housing resources in ways that reduce the effect of the gap.

Virtually all the state's housing programs foster and maintain affordable housing through either their development or rehabilitation. New developments are often funded in part with the low-income housing tax credit. Coordination of the credit with other funding resources achieves affordability for the lowest-income tenants possible.

As discussed in the Strategic Plan, the state not only evaluates and reduces lead-based paint hazards in its federally funded programs, Minnesota Housing evaluates and reduces lead hazards in state and agency-funded programs that have requirements to evaluate units for health and safety. Lead-hazard reduction is now a part of those programs.

The state is not a public housing agency, so it will not take actions to encourage public housing residents to become more involved in management. Minnesota Housing will encourage public housing residents to participate in homeownership by marketing HOME downpayment assistance to public housing residents in areas the program will be offered. The state will contact troubled PHAs to ask what the issues are that caused them to be so designated, and will work with Minnesota NAHRO to develop a strategy to address those issues.

#### §91.320(k)(1) CDBG Program Requirements

The SCDP portion of CDBG funds are made available to the state for distribution to develop viable eligible communities by providing financial assistance to address the need for decent, safe, affordable housing, and economic development and public facility needs; and to provide a suitable living environment by expanding economic opportunities, principally benefiting low- to moderate-income households.

Eligible applicants are cities with a population under 50,000, and counties and townships with an unincorporated population of fewer than 200,000.

DEED anticipates the funding level for this program to be approximately \$20,000,000 annually. Funds are made available through a competitive selection process throughout the state.

Of the amount available for awards, DEED intends to provide SCDP funds in accordance to the following approximate allocations: thirty percent (30%) for Single Purpose Applications, fifty-five percent (55%) for Comprehensive Applications. (The remaining fifteen percent (15%) allocation is designated for DEED's federal economic development set-aside). Allocation percentages may be modified by DEED if DEED determines that there is a shortage of fundable applications in any category.

#### Program (i.e. Generated) Income:

Program Income is any income received by a grantee or a sub-recipient as a result of the activities supported by State of Minnesota Small Cities Development Program (SCDP) funds. Grantees or sub-recipients will follow the requirements set by DEED (SCDP) in addition to all HUD program income regulatory requirements. DEED requirements are described in the A-Z guide on the DEED website. HUD Requirements can be found at 570.489(e).

Program/Generated Income is defined as income generated by the SCDP-funded activities, which include,but is not limited to:

- loan repayments (with interest, if applicable),

- proceeds from the sale of property purchased with SCDP funds,

- interest earned on the Program/Generated Income itself, once back under the control of the Grantee.

#### Types of SCDP Application(s)

Single Purpose Application: Aggregate funding amount cannot exceed \$600,000. (Two or more activities cannot exceed \$600,000 in total).

 Defined as one or more activities designed to meet a specific housing, public facility, or economic community development need, within a defined geographical area.

Comprehensive Application: Aggregate funding amount cannot exceed \$1.4 million and each activity within the application is limited to a maximum amount of \$600,000.

Defined as a combination of at least two interrelated activities which are
designed to address community development needs, which by their nature must
be carried out in a coordinated manner and/or require a coordination of
housing, public facilities, or community development/revitalization activities.
It must be designed to benefit a defined geographical area.

#### SCDP Application Criteria

The review process for the SCDP is designed to ensure that the limited amount of available funds are awarded to communities that:

- Meet a federal objective.
- Demonstrate a significant need for the proposed activity.
- Show a substantial impact to the community:
  - o In regard to housing activities, each applicant must determine the approach best-suited to increase and/or stabilize the supply of safe, affordable housing to low-moderate-income (LMI) residents. Based on the prevalence of substandard housing conditions within a community, the applicant must determine whether a non-targeted or targeted approach best addresses the needs of the community. A non-targeted approach may be used to address the most severe needs on a scattered site basis. A targeted approach may be used if a neighborhood within a particular community suffers from severely deteriorated housing.
- Provide evidence that the proposed activities make cost-effective use of the grant funds provided. Financial costs/budgets must be provided for each proposed activity.
- Provide evidence of leveraging from non-DEED resources to make the project viable.
- Provide evidence of administrative capacity to complete the activity in a timely manner. The
  application must include information documenting an applicant's history in administering
  prior SCDP funds and/or other programs similar in nature, to determine whether the applicant
  has the ability to complete the proposed activity. Prior SCDP performance will be taken into
  consideration for future funding.
- Have completed the necessary due diligence indicating a strong degree of readiness for the activity proposed within the application.

Applicants should not apply for funding for those activities/projects that cannot be completed within the term of the funding agreement.

#### SCDP Scoring Criteria

Up to 240 of the points will be awarded based on evaluation of the proposed project to serve low- and moderate-income persons in relationship to housing, alleviate slum and blight in commercial areas, and/or address public facility activities. The scoring is based on the need, impact, capacity, and cost effectiveness of the activities and state demographic points will be used for a tie-breaker.

Need/Impact/Capacity: Up to 180 points will be awarded based on evaluation of need, impact and capacity for the proposed project.

#### Need:

- a. the number of low- and moderate-income persons in the program area.
- b. the percentage of residents in the program area which are of low- or moderate-income.
- c. the need for the proposed program as evidence by at least two of the following: the need for improvements or additions to the housing stock serving low- and moderate-income persons,

the need for new or improved public facilities in the program area, or economic community development problems in the program area.

Impact: Evaluation of the extent to which the proposed project will eliminate or reduce the need identified and the extent to which the proposed program will improve the long-term physical or economic condition of the program area and its residents.

Capacity: Points will be awarded based on the evaluation of administrative capacity to complete the activity in a timely manner. The application must include information documenting an applicant's history in administering prior SCDP funds and/or other programs similar in nature, to determine whether the applicant has the ability to complete the proposed activity. Prior SCDP performance will be taken into consideration for future funding. Organizational capacity plays a large role in the ranking of applications.

Cost-Effectiveness: Up to 30 points will be based on evaluation of the extent to which the proposed project will make cost-effective use of grant funds, including consideration with, and use of, funds from other public and private sources.

State Demographics: Up to 30 points

a. the number of poverty-persons in the area under the applicant's jurisdiction.

b. the percentage of persons residing in the area under the applicant's jurisdiction.

c. the per capita assessed valuation of the area under the jurisdiction of the applicant, such that points are awarded in inverse relationship to the applicant's per capita assessed valuation.

Applicants will be notified in writing of the award decisions made within this competition. DEED will ensure that documentation and other information regarding each application submitted under this notice of funding availability is sufficient to indicate the basis upon which assistance was provided or denied.

#### §91.320(k)(2) HOME

#### (ii) Resale and Recapture of HOME Funds used for Homebuyers

HOME downpayment assistance (HOME HELP) will enforce affordability restrictions by a zero percent interest rate deferred payment subordinate mortgage that requires repayment of some or all of the HOME assistance if the home is sold or ceases to be the borrower's principal residence during the term of the mortgage. The amount that is subject to recapture will be reduced from 100 percent to 30 percent of the original amount of assistance after the fifth anniversary of the loan.

The amount that is subject to recapture is limited to the amount of net proceeds available (sales price minus payment of superior claims against the property and closing costs). Net proceeds are first used to repay downpayment assistance before distributing the balance to the homeowner or other claimants.

#### (iv) HOME HELP

HOME HELP will be used to provide assistance for downpayments, closing costs, and eligible soft costs to first-time homebuyers receiving a Community Activity Set-Aside (CASA) Minnesota Housing mortgage. The program's goals are increasing homeownership among households of color and providing incentives to stabilize neighborhoods by providing assistance to households that purchase foreclosed properties or homes in foreclosure-impacted areas. If ADDI funds are provided to the State, ADDI will be made available along with standard HOME funds for assisting first-time homebuyers with paying downpayment and closing costs, including eligible soft costs. ADDI will not be marketed as a separate program. The decision of whether downpayment assistance is provided from the ADDI award or the HOME award will be made on a case-by-case basis as determined by the needs of the project.

Rehabilitation costs will not be an eligible expense for projects funded with HOME HELP.

Marketing to mobile home parks and public housing located in the area of the selected CASA projects will be conducted directly by Minnesota Housing or by the CASA partners if ADDI funds are appropriated to the Agency. Outreach will be a written communication on ADDI to the directors of the public housing agencies for them to give to their clients. Outreach to mobile home parks will consist of a request to the mobile home park owner or management agent to distribute fliers within the park or to post them in common areas of the park, such as laundromats, the management office, and bulletin boards.

To ensure the suitability of families to undertake and maintain homeownership, Minnesota Housing will mandate that, at minimum, buyers complete training in the "Home Stretch" curriculum or its equivalent. "Home Stretch" is the curriculum of the Home Ownership Center, a nonprofit organization dedicated to promoting sustainable home ownership for low- and moderate-income Minnesotans through the development and delivery of quality, standardized education, counseling, and related support services. The following organizations have homebuyer education requirements and have approved Home Stretch as fulfilling those requirements: Minnesota Housing, Fannie Mae, Freddie Mac, FHLMC, FHA, Rural Development, Mortgage Guaranty Insurance Corporation, and a number of private mortgage insurers.

### §91.320(k)(3) Emergency Shelter Grant Program (ESGP)

ESGP funds are administered by DHS and allocated through a competitive funding process in conjunction with Minnesota Transitional Housing and Emergency Service Program funds each biennium.

**Fund allocation.** ESGP funds are awarded as part of a funding allocation process that combines the grant with available money from two other programs: ESP and THP. Together, ESGP and these programs provide about five million annually in funding for homeless activities.

ESG funds are available on a statewide basis. Funding is awarded to programs within all CoC regions of the state. The allocation of funding is dynamic process based on the overall quality of responses to the evaluation criteria. The state does not approach the evaluation process with a set of preferred activities or funding prioritization. Rather, applications are evaluated and funded based on their overall quality and according to the regional and local priorities established by each regional CoC committee.

In recent years, because of the increase in the funding available for transitional housing projects, a greater percentage of ESGP funds have been used for emergency shelter and homeless prevention activities. This is not a result of prioritizing ESGP funds for these activities; instead, it is a product of the funding process for all of the homeless programs. (However, areas of the state without Minnesota Family Homeless Prevention and Assistance Program funds are given priority for ESGP prevention funds, limited to 30 percent of the total ESGP funds.) Because the majority of the state's funding dedicated to homelessness is restricted to other purposes such as permanent and supportive housing and transitional housing activities, the use of ESGP for emergency shelter and homeless prevention ensures that these activities receive funding.

Priorities for the use of ESG funds may change over the five year period covered by this plan depending on the changes in the availability of other homeless program funds including but not limited to the Minnesota Transitional Housing Program, Minnesota Emergency Services Program or Family Homeless Prevention and Assistance Program. The state will use the flexibility of ESG funds to create the most appropriate balance of prevention, shelter, transitional housing and supportive services only resources depending on what available in the state as a whole.

For the time period covered by ESG Program Year 2009, funding for the operating and supportive services costs of shelters will remain scarce, therefore, the priorities established for ESG program year 2007, that of funding the costs of shelters, will remain unchanged. Ninety-seven percent of ESG 2008 program year funds are budgeted to meet the operating and supportive service costs of shelters. The remaining three percent of funds are allocated to areas of the state which do not receive Family Homeless Prevention and Assistance Program funding for prevention activities. These prevention funds assure that all areas of the state have at least some homelessness prevention funding.

**Evaluation criteria.** Applications for funding are divided into CoC regions and are reviewed by DHS staff. DHS staff may also seek input from other state agencies regarding proposals pertaining to their particular area of expertise. DHS seeks input from CoC Committees by allowing each CoC to review and rank proposals and make funding recommendations based on the following criteria:

- The completeness of the application (possible 10 points)
- Collaboration and planning (10 points)
- Program design (20 points)

Supportive services (20 points)

- Efforts to meet best practices for transitional housing programs and efforts to work with homeless (10 points)
- Revenue and other sources of support (10 points)
- Reasonableness of the budget (20 points)

**Notice of RFP.** RFPs are sent to current grantees, all known homeless program providers in the state, social service agencies, CAAs and tribal governments (although not eligible for ESGP), and to other parties upon request.

**Leveraging.** Leveraging is not required for the ESGP, but the state is expected to provide matching funds equal to the amount of ESG funding, to meet the matching requirement of \$ 3,738,000. The Minnesota Transitional Housing Program and \$950,000 from the Minnesota ESP are used. Service providers leverage private and local government funds to provide an adequate funding base for their programs.

#### Awards Adjustment if Funding is More or Less than Initially Estimated

If the amount of ESG funds actually received are more or less than the amount of funding originally estimated in the initial fund allocation, the DHS will adjust awards as follows:

In the initial review of applications for funding, review-committee members score and rank each application according to its merit. Criteria used to score and rank proposals are:

- Completeness of application
- Need for the program
- Need for assistance
- Efforts that outreach and program recruitment efforts reach the hardest-to-serve populations
- Reasonableness and effectiveness of program design
- Reasonableness of budget

If a lesser amount of funding is received, the review committee will reconvene and apply reductions to the lowest-ranked proposals that received funding. The number of affected proposals will depend on the amount of the reduction. Similarly, if additional funding is received, the applications with the highest ranking that did not originally receive all the funding they requested will be awarded additional funds. Again, the number of affected proposals will depend on the amount of the increase.

#### §91.320(k)(4) HOPWA

Minnesota Housing will award its HOPWA allocation to continue its program of temporary emergency rent, mortgage, and utility assistance for persons and families with HIV/AIDS by extending the funding of the Minnesota AIDS Project, which provides this assistance outside the EMSA.

The state anticipates that 110 household will be assisted in the 2009 program year.

<sup>&</sup>lt;sup>1</sup> Pages 35 through 37 of Section V of the 2002-2006 Consolidated Plan describe the Continuum of Care regions and provide points of contact for additional information.

# Appendix A Certifications

# Appendix B Key Persons

# APPENDIX B. Key Persons

#### State Agencies

Three state agencies were involved in the 2008 Action Plan planning process: The Minnesota Department of Employment and Economic Development (DEED), the Minnesota Housing, and the Minnesota Department of Human Services (DHS). DEED is the lead agency responsible for oversight and preparation of the Plan.

The following individuals from each of the agencies participated in development of the Action Plan:

Jim Cegla, Minnesota Housing

Jeremy LaCroix, DEED

Christine Schieber, DEED

Reed Erickson, DEED

Pat Leary, DHS

## Appendix C Public Notices

#### STATE OF MINNESOTA

#### Department of Employment and Economic Development

#### Minnesota Housing Finance Agency

#### Minnesota Department of Human Services

#### NOTICE OF PUBLIC HEARINGS AND DRAFT AVAILABILITY

2009 ACTION PLAN OF THE STATE OF MINNESOTA'S 2007-2011 CONSOLIDATED HOUSING AND COMMUNITY DEVELOPMENT PLAN AND CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER) FOR 2008

The State of Minnesota announces its process for developing its 2009 Action Plan of the 2007-2011 Consolidated Housing and Community Development Plan (Consolidated Plan), and the 2008 Consolidated Annual Performance and Evaluation Report (CAPER). The state encourages citizens to attend the public hearings and review and comment on the draft reports.

The Consolidated Plan is a report that the state submits annually to the U.S. Department of Housing and Urban Development (HUD) in order to receive federal housing and community development funding through the Community Development Block Grant (CDBG), HOME Investment Partnerships, Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs. The Consolidated Plan examines the housing and community development needs of the state, sets priorities for allocation of the HUD funds, and establishes an annual Action Plan for meeting current and future needs in the coming year.

The state submits its CAPER to HUD annually as one of the conditions of receiving federal funds under the programs identified above. The CAPER provides information to measure the state's progress during the past year in meeting assistance goals and priorities identified in the Consolidated Plan. The CAPER includes a summary and analysis of progress

made on identified actions that state agencies have elected to undertake to affirmatively further fair housing and overcome impediments to fair housing.

The state will hold its first public hearing about the Action Plan on Wednesday,

October 15, 2008, to gather citizen input on housing and community development needs and
how federal funding should be allocated in the state. The hearing will be held at 5:00 p.m. at
the Minnesota Department of Employment and Economic Development, 332 Minnesota Street,

2<sup>nd</sup> floor, St. Paul.

A second public hearing on the Action Plan will be held on Friday, December 5, 2008. This public hearing will be for review and comment on the draft Action Plan and will be held at 5:00 p.m. at the Minnesota Department of Employment and Economic Development, 332 Minnesota Street, 2<sup>nd</sup> floor, St. Paul. Call 1-800-657-3858 or (651) 259-7462, or TTY 1-800-282-5909 or (651) 296-3900 for more information about these hearings.

Drafts of the 2009 Action Plan and the CAPER for 2008 will be available for public review and comment between November 5, 2008, and the close of business December 8, 2008. The draft Action Plan and CAPER will be available on the Internet at <a href="www.mnhousing.gov">www.mnhousing.gov</a> and <a href="www.mnhousing.gov">www.mnhousing.gov</a> and <a href="www.deed.state.mn.us">www.deed.state.mn.us</a> and in state depositories identified in the Citizen Participation Plan, which may be viewed at the same internet locations. Hard copies of the Action Plan can be obtained by calling Gloria Stiehl, Department of Employment and Economic Development, 1-800-657-3858 or (651) 259-7462, or TTY 1-800-282-5909 or (651) 296-3900. Hard copies of the CAPER can be obtained by calling Minnesota Housing Finance Agency at 1-800-657-3769 or (651) 296-7608, or TTY (651) 297-2361.

Written public comments on the Action Plan can be submitted to:

Action Plan, Attn: Gloria Stiehl

Minnesota Department of Employment

and Economic Development

First National Bank Building

332 Minnesota Street, Suite E200

St. Paul, MN 55101-1351

Written comments may also be submitted by fax to (651) 296-1290 or by email to gloria.stiehl@state.mn.us. To ensure consideration of your comments, type "Action Plan" in the subject line of your e-mail.

Written public comments on the 2008 CAPER can be submitted to:

**CAPER** 

Minnesota Housing Finance Agency

400 Sibley Street, Suite 300

St. Paul, MN 55101

Written comments may also be submitted by fax to (651) 296-8139 or by email to mn.housing@state.mn.us. To ensure consideration of your comments, type "CAPER" in the subject line of your e-mail.

The Action Plan and CAPER will be submitted to HUD on or before December 30, 2008. The state will consider any comments from individuals or groups received in writing or at public hearings. A summary of the written and public hearing comments and the state's responses will be included in the final Action Plan.

### State Depository Libraries List Notice of Draft of the 2009 Action Plan and CAPER Public Hearings

Arrowhead Library System 5528 Emerald Avenue Mountain Iron, MN 55768

Bemidji Public Library 509 American Avenue NW Bemidji, MN 56601

Duluth Public Library
Attn: Government Documents Dept.
520 West Superior Street
Duluth, MN 55802

East Central Regional Library 244 South Birch Cambridge, MN 55008-1588

Grand Marais Public Library P.O. Box 280 Grand Marais, MN 55604-0280

Great River Regional Library 405 St. Germain St. Cloud, MN 56301

Lake Agassiz Regional Library P.O. Box 699 Moorhead, MN 56560

Marshall-Lyon County Library 301 West Lyon Street Marshall, MN 56258

Minneapolis Public Library Attn: Government Documents Dept. 300 Nicollet Mall Minneapolis, MN 55401

Minnesota Valley Regional Library 100 East Main Street Mankato, MN 56002

Nobles County Library P.O. Box 99 Worthington, MN 56198 Northwest Regional Library 101 East 1<sup>st</sup> Street Thief River Falls, MN 56701-2041

Owatonna/Steele County Library P.O. Box 387 Owatonna, MN 55060-7488

Red Wing Public Library 225 East Avenue Red Wing, MN 55066-2298

Rochester Public Library 101 Second Street SE Rochester, MN 55904

St. Paul Public Library
Attn: Government Documents Dept.
90 West 4<sup>th</sup> Street
St. Paul, MN 55102

Willmar Public Library 410 – 5<sup>th</sup> Street SW Willmar, MN 56201-3298

Winona Public Library P.O. Box 1247 Winona, MN 55987

### State Depository Organizations List Notice of Draft Citizen Participation Plan Availability and Public Comment Period

Arrowhead RDC 221 West 1<sup>st</sup> Street Duluth, MN 55802

East Central RDC 100 Park Street South Mora, MN 55051

Headwaters RDC P.O. Box 906 Bemidji, MN 56601-0906

Metropolitan Council 230 East 5<sup>th</sup> Street St. Paul, MN 55101-1634

Mid-Minnesota RDC 333 West 6<sup>th</sup> Street Willmar, MN 56201-9999

Northwest RDC 115 South Main, Suite 1 Warren, MN 56762

Region Five RDC 611 Iowa Avenue Staples, MN 56479

Region Nine RDC P.O. Box 3367 Mankato, MN 56002-3367

Southwest RDC 2401 Broadway Avenue, Suite 1 Slayton, MN 56172-1142

Upper Minnesota Valley RDC 323 West Schlieman Appleton, MN 56208-1299

Central Minnesota Housing Partnership 810 West St. Germain, Suite 303 St. Cloud, MN 56301 Minnesota Housing Partnership 1821 University Avenue West #137 St. Paul, MN 55104

Southeast Minnesota Housing Network 1414 North Star Drive Zumbrota, MN 55992

Southwestern Minnesota Housing Partnership 2401 Broadway Avenue, Suite 4 Slayton, MN 56172-1142

Tri-Valley Opportunity Council 102 North Broadway Crookston, MN 56716

West Central Minnesota Housing Partnership 1500 North Memorial Building Fergus Falls, MN 56537

Central MN Initiative Fund 405 First Street SE Little Falls, MN 56345

Northland Foundation 202 West Superior Street, Suite 610 Duluth, MN 55802

Northwest Minnesota Foundation 4225 Technology Drive NW Bemidji, MN 56601

The Initiative Fund of Southeast and South Central Minnesota 525 Florence Avenue Owatonna, MN 55060

Southwest Minnesota Foundation 1390 Hwy. 15 South PO Box 428 Hutchinson, MN 55350

West Central Minnesota Initiative Fund 1000 Western Avenue Fergus Falls, MN 56537

#### State Depository Organizations List Notice of Draft Citizen Participation Plan Availability and Public Comment Period

American Indian Housing Corp. 2020 Bloomington Avenue South Minneapolis, MN 55404-3073

Asian-Pacific Council 658 Cedar Street St. Paul, MN 55155-1603

Central Cultural Chicano 1915 Chicago Avenue Minneapolis, MN 55404-1904

CLUES 220 South Robert Street, Suite 103 St. Paul, MN 55107

Council on Black Minnesotans 426 Wright Building 2233 University Avenue St. Paul, MN 55114

Minnesota Coalition for the Homeless 122 West Franklin Avenue, Suite 306 Minneapolis, MN 55404

Chicano Latino Affairs Council 555 Park Street, Suite 210 St. Paul, MN 55103

Upper Midwest American Indian Center 1912 Emerson Avenue Minneapolis, MN 55411

Arrowhead Economic Opportunity Agency 702 South 3<sup>rd</sup> Avenue Virginia, MN 55792

## Appendix D Tables

All tables are in action plan.

# Appendix E Comments

No comments have been received as of 10/23/2008.